

1 Matthew I. Knepper, Esq.
Nevada Bar No. 12796
2 Miles N. Clark, Esq.
Nevada Bar No. 13848
3 KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
4 Las Vegas, NV 89148
Phone: (702) 856-7430
5 Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
6 Email: miles.clark@knepperclark.com

7
8 David H. Krieger, Esq.
Nevada Bar No. 9086
9 KRIEGER LAW GROUP, LLC
2850 W. Horizon Ridge Parkway, Suite 200
10 Henderson, NV 89052
Phone: (702) 848-3855, Ext. 101
11 Email: dkrieger@kriegerlawgroup.com

12 *Counsel for Plaintiffs*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 ERNESTO CISNEROS; and MARIA
16 CISNEROS,

17 Plaintiffs,

18 v.

19 AUTOSCRIBE FINANCIAL PROCESSING,
20 LLC; CITIBANK CALIFORNIA; EARLY
WARNING SERVICES, LLC; and WELLS
FARGO BANK, N.A.,

21 Defendants.
22

Case No. 2:20-cv-00759-KJD-NJK

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO RESPOND TO
CITIBANK'S MOTION TO DISMISS
COMPLAINT AND MOTION TO COMPEL
ARBITRATION**

Complaint filed: April 27, 2020

23 Plaintiffs Ernesto Cisneros and Maria Cisneros ("Plaintiffs"), by and through their counsel
24 of record, and Defendant¹ Citibank, N.A. (*incorrectly named by Plaintiffs as Citibank California*)
25

26
27 ¹ Plaintiffs have settled their claims with Early Warning Services, LLC; Autoscribe
28 Financial Processing, LLC; and Wells Fargo Bank, N.A. A notice of settlement was filed on July
20, 2020 [ECF Dkt. 17].

1 (“Citibank”) have agreed and stipulated to the following:

2 1. On April 27, 2020, Plaintiff filed a Complaint [ECF Dkt. 1].

3 2. On July 20, 2020, Citibank filed a Motion to Dismiss the Complaint [ECF Dkt.20]
4 and a Motion to Compel Arbitration [ECF Dkt. 19].

5 3. Plaintiff’s Response is due August 3, 2020.

6 4. Plaintiff and Citibank have agreed to extend Plaintiff’s response fourteen days in
7 order to allow Plaintiff to consider the facts and circumstances of the pending briefing, and to
8 extend Citibank’s deadline to file their replies in support of their motions for fourteen days for the
9 same reasons. The Parties are also engaging in settlement discussions, and resolution without
10 burdening the Court with potentially unnecessary briefing aids in judicial economy. As a result,
11 both Plaintiffs and Citibank hereby request this Court to further extend the date for Plaintiff to
12 respond to Citibank’s Motion to Dismiss Complaint and Motion to Compel Arbitration until
13 **August 17, 2020** and to extend the date for Citibank to file their Replies until **August 31, 2020**.
14

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28

5. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

Dated August 3, 2020.

KNEPPER & CLARK LLC	AKERMAN LLP
<u>/s/ Miles N. Clark</u>	<u>/s/ Ariel E. Stern</u>
Matthew I. Knepper, Esq., SBN 12796	Ariel E. Stern, Esq., SBN 8276
Miles N. Clark, Esq., SBN 13848	Holly E. Walker, Esq., SBN 14295
5510 So. Fort Apache Rd, Suite 30	1635 Village Center Circle, Suite 200
Las Vegas, NV 89148	Las Vegas, NV 89134
Email: matthew.knepper@knepperclark.com	Email: ariel.stern@akerman.com
Email: miles.clark@knepperclark.com	Email: holly.walker@akerman.com
KRIEGER LAW GROUP, LLC	<i>Counsel for Defendant</i>
David H. Krieger, Esq., SBN 9086	<i>Citibank, N.A. (incorrectly named by</i>
2850 W. Horizon Ridge Parkway, Suite 200	<i>Plaintiffs as Citibank California)</i>
Henderson, NV 89052	
Email: dkrieger@kriegerlawgroup.com	
<i>Counsel for Plaintiffs</i>	


ORDER GRANTING

STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO CITIBANK'S

MOTION TO DISMISS COMPLAINT AND MOTION TO COMPEL ARBITRATION

IT IS SO ORDERED.

Dated: 8/4/2020, _____


UNITED STATES DISTRICT JUDGE

Cisneros et al v. Early Warning Services, LLC et al
Case No. 2:20-cv-00759-KJD-NJK